NASA SHARED SERVICES CENTER

Financial Disclosure – Initial Movement of Employee to Position Requiring Reporting (25.2) Service Delivery Guide (3.2.3.6)

Revision: Basic

June 5, 2006

Approved by

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Joyce M. Short
Director, Service Delivery

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Date

Document History Log

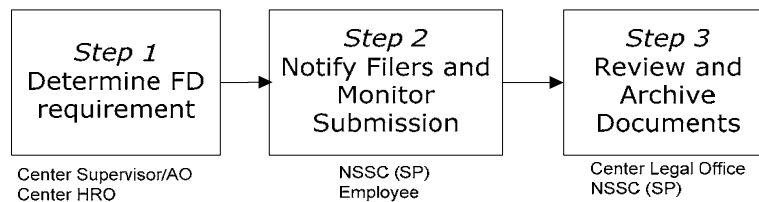| Status (Basic/Revision Cancelled	Document Version	Effective Date	Description of Change
Basic			Basic Release

Financial Disclosure – Initial Movement of Employee to Position Requiring Reporting

Introduction

In addition to the annual filing requirement, employees must file a financial disclosure report within 30 days after moving from a position (or duties) that did not require financial disclosure reporting to a position (or duties) that requires reporting. For potential OGE-450 filers, upon movement to a new position (or new duties), the Supervisor determines if the position meets the criteria for Financial Disclosure (FD) and relates that information to the Administrative Officer (AO). If the position meets the criteria, the AO will update Ethics Program Tracking System (EPTS) and inform the Center Human Resources Offices (HRO). The Center HRO is then responsible for updating Federal Personnel Processing System/Position Description Manager (FPPS/PDM) as appropriate. NSSC will run regular reports in EPTS to identify new entries that require completion of the OGE-450 or SF-278 form.

Process – Overview of Financial Disclosure – Initial Movement of Employee to Position Requiring Reporting

Step 1 Determine FD requirement	Step 2 Notify Filers and Monitor Submission	Step 3 Review and Archive Documents
Center Supervisor/AO Center HRO	NSSC (SP) Employee	Center Legal Office NSSC (SP)

Roles & Responsibilities

Roles and Responsibilities	Action	Tips
Step 1 **Center Supervisor/AO Center HRO** Determine Financial Disclosure Requirement	When a hire, reassignment, or promotion action is proposed, the Center Supervisor/AO determines if the position meets the criteria for Financial Disclosure and if so, updates the EPTS. The Center HRO PDM reviews the SF-52 submitted and the position description to determine if the financial disclosure requirement is appropriate. If the position should require financial disclosure, the Center HRO updates FPPS and the PDM system with the financial disclosure designation. The Center HRO updates the FPPS/PDM with FD designation within one day of the effective date of the personnel action. **Output:** Financial Disclosure Designation	Relevant policy directives: NPD 1900.9D NPR 1900.3A CH.4 5CFR Part 2634 Also see: www.usoge.gov Affected employees can also be determined from supervisor review of position descriptions. Decision is made on position, not person.
Step 2 **NSSC (SP) Employee** Notify Filers and Monitor Submission	NSSC (SP) runs a weekly report from EPTS to identify the new filers. Within twenty-four (24) hours of running the report and identifying a filer, NSSC (SP) sends an email to the filer, through EPTS. The email notifies the employee of his/her requirement to file an OGE-450 or	Employees faces a $200.00 fine if SF-278 is not filed within thirty (30) days of assuming the position. The Office of General Counsel can give an

Roles and Responsibilities	Action	Tips
	SF-278, the filing deadline, and for the SF-278 filers, the potential for a fine, should the employee fail to file in a timely manner. The employee completes and signs the OGE-450 or SF-278, contacting NSSC (SP) for resolution of any questions. NSSC (SP) monitors EPTS to make certain that filers complete all required fields correctly, and submits forms within the time parameters. Once the form is submitted and reviewed, NSSC (SP) inputs the date submission received/reviewed in EPTS. EPTS sends an email to the Center Office of General Counsel (or Agency OGE for certain positions) that the forms are complete and ready for review. **Output:** Completed Form	extension upon request by employee, if requested in advance of due date. Employees coming from another public filing position are exempt from this requirement.
Step 3 **Center Legal Office** **NSSC (SP)** Review and Archive Documents	The Center's Legal Office reviews for accuracy and completeness and resolves legal issues with employees. Additionally, they determine if conflict resolution is necessary. If a potential conflict exists, the Center's Legal Office writes a 'cautionary letter' and sends it to the employee. The letters and forms are archived in the EPTS system. **Output:** Cautionary Letter/Documents Archived	Forms must be filed with the original signature or approved electronic signature and stored for six (6) years.

Metrics

Initiating Office/Entity	Deliverable (Output)	Receiving Office/Entity	Metric
Center HRO	Updates FPPS/PDM with FD designation	FPPS/PDM	Within one (1) day of coding SF-52
NSSC (SP)	Run report weekly from EPTS	Employee	Notify employee within twenty-four (24) hours of identifying new filer from weekly report
NSSC (SP)	Documents date submission is received (NSSC will review the document for completeness before inputting the receipt date).	EPTS	Within two (2) days of submission

Privacy Data

All participants involved must ensure protection of all data covered by the Privacy Act.

System Components

Existing Systems

IT System Title	IT System Description	Access Requirements	IT System Interfaces
EPTS	EPTS for all NASA SF-278 and OGE-450 filers	Internal and External NSSC customers	TBD

New Systems

None Identified

Generic System Title	Business Requirements for System	Access Requirements	IT System Interfaces
N/A			

Contact Center Strategy

Each activity requires a clearly defined contact center strategy which answers the question, "Who will answer the call and handle the request" and defines the escalation parameters for the activity. Because of the varied nature of the NSSC's activities and volume of transactions, each activity has a unique Contact Center strategy. Refer to the NASA Shared Service Center Customer Contact Center Service Delivery Guide (3.5.1) for the Contact Center strategy concerning this activity.

Appendix – Process Flow Diagram

Financial Disclosure – Initial Movement of Employee to Position Requiring Reporting Process

Note 1:

Relevant Policy Directives
• NPD 1900.9D
• NPR 1900.3A Ch. 4
• 5 CFR Part 2634

Also see:
• www.usoge.gov
• Affected employees can also be determined by supervisor review of position descriptions
• Decision is made on position, not person

Note 2:

FPPS must be updated within one (1) day of effective date.

Note 3:

Employees must file SF-278 by May 15 or face $200.00 fine if not filed by June 15.

Financial Disclosure – Initial Movement of Employee to Position Requiring Reporting Process

NSSC (SP)

Center Legal Office

A

System sends email to supervisor that forms ready for review

EPTS

Review for accuracy and completeness

Resolve legal issues with employee

Determine if conflict resolution needed

If potential conflict exists, write 'cautionary letter'

Cautionary Letter

Note 4:

• Forms must be filed with original signature or approved electronic signature.

• Forms must be stored for six (6) years.

Employee

Send letter to employee

Receives cautionary letter

Archive documents (Note 4)

Letters are archived electronically in EPTS

EPTS

End